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__/S/ Frank Peretore____
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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

X Case No. 08-14631(GMB)

In re:

Chapter 11

:

SHAPES/ARCH HOLDINGS, L.L.C. et al.,

:

Debtors. -----X

OBJECTION OF NATIONAL CITY COMMERCIAL CAPITAL COMPANY, LLC TO NOTICES OF FILING OF SCHEDULE 8.1 TO DEBTORS' THIRD AMENDED PLAN

TO THE HONORABLE GLORIA M. BURNS UNITED STATES BANKRUPTCY JUDGE

The objection of National City Commercial Capital Company, LLC ("National City"), by its attorneys, Peretore & Peretore, P.C., respectfully shows and alleges:

TRANSACTIONS

1. National City is the assignee with regard to a certain Material Usage Agreement ("Agreement") for Intergrid Material (the "Equipment") to the Debtor, as more particularly described below.

- 2. More specifically, on or about April 5, 2005, the Debtor through the signature of its CFO, as Lessee, entered into the Agreement with National City, as assignee of GED Integrated Solutions.
- 3. The Debtor has defaulted under the terms of the Agreement by failing to pay \$46,922.32; Pre-petition \$2,489.07, and Post-petition \$44,433.25.

BANKRUPTCY PROCEEDINGS

- 4. On March 16, 2008, a voluntary petition was filed by Shapes/Arch Holdings, L.L.C. ("Debtor") under 11 U.S.C. §§101-1330 (as amended, the "Bankruptcy Code").
- 5. On or about May 15, 2008, National City filed a Proof of Claim in the amount of \$129,356.51.
 - 6. Debtor has issued a Notice of Filing of Schedule 8.1 to Debtors' Third Amended Plan.

CURE NOTICES AT ISSUE

- 7. Said notice states in Annex A, the debtor believes the cure amount for National City is \$0.00.
- 8. The Cure Amount alleged by the Debtor is incorrect and National City hereby objects to same.
- 9. As evidenced by National City's breakdown above, the amount to cure the pre-petition arrears is \$2,489.07 and the amount to cure the post-petition arrears through June 30, 2008, is FORTY-FOUR THOUSAND FOUR HUNDRED THIRTY THREE DOLLARS AND 25/100 (\$44,433.25).

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WHEREFORE, NATIONAL CITY respectfully requests that its objection be sustained and the Debtor be required to provide National City the Cure Amount as provided herein, and for such other and further relief as the Court deems just and equitable.

Dated: July 1, 2008

/s Frank Peretore, Esq.
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